

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**V.** : **DATE FILED:** \_\_\_\_\_  
**SHEA DRULYK** : **VIOLATIONS:**  
18 U.S.C. § 1341 (mail fraud - 1 count)

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

**THE DEFENDANT**

1. Defendant SHEA DRULYK was a paramedic who worked for American Para Professional Services (APPS), a medical services company located in Collingdale, Pennsylvania. As part of her employment, she conducted medical screenings for life insurance companies as part of the application process for term life insurance policies. She visited applicants at home or work, obtained vital signs, documented medical history and other personal information, and drew a blood sample.

2. Robert Mitchell, charged elsewhere, was a 40-year old, healthy, non-smoker, who lived and worked in Philadelphia.

**THE VICTIMS**

3. Insurance companies issue life insurance policies to individuals based on numerous criteria, including but not limited to age, physical condition, and whether the individual is a smoker.

4. Insurance companies routinely require individuals seeking life insurance to submit to a medical examination to assist their determination of (1) whether the individual will be issued a policy, and if so, (2) how much of a premium will be charged for the policy, and (3) the amount of life insurance coverage under the policy.

5. Medical screeners are employed by life insurance companies to perform the medical examination, which includes drawing blood from the policy applicant. The blood is mailed to a laboratory for analysis and the analysis results are mailed to the relevant insurance company for evaluation and use in processing the life insurance application.

### **THE SCHEME**

6. From in or about April 2002 to in or about October 2002, defendant SHEA DRULYK and Robert Mitchell devised and intended to devise a scheme to defraud various life insurance companies and to obtain money and property by mean of false and fraudulent pretenses, representations and promises.

### **MANNER AND MEANS**

It was part of the scheme that:

7. Robert Mitchell received payment from various individuals who desired to obtain insurance policies for family members who were elderly, in poor physical condition or smokers.

8. Robert Mitchell posed as the policy applicant at medical examinations, where he provided blood, forged documents and falsely represented himself as the actual individual seeking to obtain life insurance.

9. Unbeknownst to her employer APPS, defendant SHEA DRULYK received payment from Robert Mitchell to falsely document the medical condition of applicants during the

application process for life insurance policies.

10. Defendant SHEA DRULYK, on numerous occasions, drew Robert Mitchell's blood for the purpose of satisfying the requirement that each applicant receive a medical examination because Mitchell knew that he would successfully pass the medical examination and that the actual policy applicant would not or would be subject to very high premiums due to age or poor health.

11. Robert Mitchell mailed and caused to be mailed fraudulent life insurance policy applications and other fraudulent documents to various life insurance companies in the United States.

12. Defendant SHEA DRULYK mailed blood samples drawn from Robert Mitchell to laboratories for testing. Defendant DRULYK fraudulently submitted these blood samples as the blood taken by her from the life insurance applicants. The results of such tests were routinely mailed or shipped by interstate commercial carrier to relevant insurance companies as part of the life insurance application process.

13. On various occasions between April 2002 and October 2002, defendant SHEA DRULYK assisted Robert Mitchell in obtaining or attempting to obtain at least 29 life insurance policies for paying customers through these various fraudulent methods.

14. On or about April 26, 2002, defendant SHEA DRULYK drew Robert Mitchell's blood knowing Mitchell was posing as life insurance applicant H.F. at a medical examination.

15. On or about April 26, 2002, in the Eastern District and elsewhere, defendant

**SHEA DRULYK,**

for the purpose of executing the scheme, and attempting to do so, knowingly caused to be delivered by commercial interstate carrier a package to Lab One, P.O. Box 12035, Shawnee Mission, Kansas 66201-9952, which contained the blood drawn from Robert Mitchell and falsely purported to be the blood of H.F., whose life insurance application was pending with Americo Financial Life & Annuity Insurance Company.

In violation of Title 18, United States Code, Section 1341.

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**PATRICK L. MEEHAN**  
**United States Attorney**